UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

IN RE PORK ANTITRUST LITIGATION

Civil No. 18-1776 (JRT/HB)

This Document Relates To:

All Actions

JOINT UPDATE LETTER

Dear Judge Bowbeer:

Pursuant to the proposed order submitted at ECF No. 615 and Joint Update Letter submitted at ECF 649, Direct Purchaser Plaintiffs ("DPPs") and Commercial and Institutional Indirect Purchaser Plaintiffs ("CIIPPs") (collectively, "Plaintiffs") and Defendants hereby provide the following joint update regarding the status of their ongoing negotiations regarding document search methodology and search terms.

The Parties have met and conferred regarding the search terms that will be used by Plaintiffs on their ESI and have reached agreement. As such, there is no dispute that requires the Court's intervention at this time.

Dated: February 5, 2021

/s/ Bobby Pouya

Bobby Pouya (Pro Hac Vice)

Clifford H. Pearson (Pro Hac Vice)

Daniel L. Warshaw (Pro Hac Vice)

Michael H. Pearson (Pro Hac Vice)

PEARSON SIMON & WARSHAW, LLP

15165 Ventura Boulevard, Suite 400

Sherman Oaks, CA 92403

Telephone: (818) 788-8300

Facsimile: (818) 788-8104

cpearson@pswlaw.com

dwarshaw@pswlaw.com

bpouya@pswlaw.com

mpearson@pswlaw.com

Melissa S. Weiner (MN #0387900)

Joseph C. Bourne (MN #0389922)

PEARSON, SIMON & WARSHAW, LLP

800 LaSalle Avenue, Suite 2150

Minneapolis, MN 55402

Telephone: (612) 389-0600

Facsimile: (612) 389-0610

mweiner@pswlaw.com

jbourne@pswlaw.com

Bruce L. Simon (Pro Hac Vice)

PEARSON, SIMON & WARSHAW, LLP

350 Sansome Street, Suite 680

San Francisco, CA 94104

Telephone: (415) 433-9000

Facsimile: (415) 433-9008

bsimon@pswlaw.com

/s/ Arielle S. Wagner

Arielle S. Wagner (MN #0398332)

W. Joseph Bruckner (MN #0147758)

Brian D. Clark (MN #0390069)

Craig S. Davis (MN #0148192)

Simeon A. Morbey (MN #0391338)

Stephen M. Owen (MN # 0399370)

Stephanie A. Chen (MN #0400032)

LOCKRIDGE GRINDAL NAUEN P.L.L.P. 100 Washington Avenue South, Suite 2200

Minneapolis, MN 55401

Telephone: (612) 339-6900

Facsimile: (612) 339-0981

aswagner@locklaw.com

wibruckner@locklaw.com

csdavis@locklaw.com

bdclark@locklaw.com

samorbey@locklaw.com

smowen@locklaw.com

sachen@locklaw.com

Co-Lead Class Counsel for Direct Purchaser Plaintiffs

/s/ Shawn M. Raiter

Shawn M. Raiter (MN# 240424) LARSON • KING, LLP 2800 Wells Fargo Place 30 East Seventh Street St. Paul, MN 55101 Telephone: (651) 312-6518 sraiter@larsonking.com

Jonathan W. Cuneo
Joel Davidow
Blaine Finley
Yifei "Evelyn" Li
CUNEO GILBERT & LADUCA, LLP
4725 Wisconsin Avenue NW, Suite 200
Washington, DC 20016
Telephone: (202) 789-3960
jonc@cuneolaw.com
joel@cuneolaw.com
bfinley@cuneolaw.com
evelyn@cunelolaw.com

Co-Lead Counsel for Commercial and Institutional Indirect Purchaser Plaintiffs

/s/ Mark L. Johnson

Mark L. Johnson (#0345520)
Virginia R. McCalmont (#0399496)
GREENE ESPEL PLLP
222 South Ninth Street, Suite 2200
Minneapolis, MN 55402
(612) 373-0830
mjohnson@greeneespel.com
vmccalmont@greeneespel.com

Daniel Laytin, P.C. (pro hac vice)
Christa Cottrell, P.C. (pro hac vice)
Christina Briesacher (pro hac vice)
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
(312) 861-2000
daniel.laytin@kirkland.com
christa.cottrell@kirkland.com
christina.briesacher@kirkland.com

Counsel for Clemens Food Group, LLC and The Clemens Family Corporation

/s/ Richard A. Duncan

Richard A. Duncan (#0192983) Aaron D. Van Oort (#0315539) Craig S. Coleman (#0325491) Emily E. Chow (#0388239) Isaac B. Hall (#0395398) Bryan K. Washburn (#0397733) **DRINKER** FAEGRE **BIDDLE** & REATH LLP 2200 Wells Fargo Center 90 South Seventh Street Minneapolis, MN 55402-3901 (612) 766-7000 richard.duncan@faegredrinker.com aaron.vanoort@faegredrinker.com craig.coleman@faegredrinker.com emily.chow@faegredrinker.com isaac.hall@faegredrinker.com bryan.washburn@faegredrinker.com

Counsel for Hormel Foods Corporation and Hormel Foods, LLC

/s/ David P. Graham

David P. Graham DYKEMA GOSSETT PLLC 90 S 7th Street, FL 2 Minneapolis, MN 55402 Telephone: 612-486-1521 dgraham@dykema.com

Rachel Adcox (pro hac vice)
Tiffany Rider (pro hac vice)
AXINN, VELTROP & HARKRIDER
LLP
950 F. Street, NW
Washington, DC 20004
Telephone: 202.912.4700
radcox@axinn.com
trider@axinn.com

Jarod Taylor (pro hac vice pending)
AXINN, VELTROP & HARKRIDER
LLP
90 State House Square
Hartford, CT 06103
Telephone: 860.275.8109
jtaylor@axinn.com

Counsel for Tyson Foods, Inc., Tyson Fresh Meats, Inc., and Tyson Prepared Foods, Inc.

/s/ William L. Greene

William L. Greene (#0198730)
Peter J. Schwingler (#0388909)
Jon M. Woodruff (#0399453)
STINSON LLP
50 South Sixth Street, Suite 2600
Minneapolis, MN 55402
(612) 335-1500
william.greene@stinson.com
peter.schwingler@stinson.com
john.woodruff@stinson.com

J. Nicci Warr (pro hac vice) STINSON LLP 7700 Forsyth Blvd., Suite 1100 St. Louis, MO 63105 (314) 863-0800 nicci.warr@stinson.com

Counsel for Seaboard Foods LLC

/s/ John A. Cotter

John A. Cotter (#0134296)
John A. Kvinge (#0392303)
LARKIN HOFFMAN DALY &
LINDGREN LTD.
8300 Norman Center Drive, Suite 1000
Minneapolis, MN 55427-1060
(952) 835-3800
jcotter@larkinhoffman.com
jkvinge@larkinhoffman.com

Richard Parker (pro hac vice)
Josh Lipton (pro hac vice)
GIBSON, DUNN & CRUTCHER, LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306
(202) 955-8500
rparker@gibsondunn.com
jlipton@gibsondunn.com

Brian Robison (pro hac vice) GIBSON, DUNN & CRUTCHER, LLP 2001 Ross Avenue, Suite 2100 Dallas, TX 75201-6912 (214) 698-3370 brobison@gibsondunn.com

Counsel for Smithfield Foods, Inc.